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March 8, 2013

ELECTRONICALLY FILED

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street, Room 7W
Trenton, NJ 08608

***Re: In re New Jersey Tax Sales Certificates Antitrust Litig.
Master Docket No.: 3:12-CV-01893-FLW-TJB***

Dear Judge Shipp:

Plaintiff class representatives have entered into settlement agreements with Defendants David Butler, David M. Farber, CCTS, LLC, CCTS Tax Liens I, LLC, CCTS Tax Liens II, LLC, DSBD, LLC, Pro Capital, LLC, Pro Capital Fund I, LLC (the "CCTS Defendants"), Robert E. Rothman ("Rothman"), and Richard J. Pisciotta, Jr. ("Pisciotta," and with the CCTS Defendants and Rothman, the "Settling Defendants") in *In re New Jersey Tax Sales Certificates Antitrust Litigation*. Plaintiffs previously submitted to the Court the settlement agreements with the CCTS Defendants and Rothman, and will soon be submitting to the Court the settlement agreement entered into with Pisciotta. The parties will also soon file for preliminary approval of the settlements with the Settling Defendants. The settlement agreements with the Settling Defendants each provide that all proceedings as to those Settling Defendants shall be stayed pending preliminary and final approval of the agreement, and that Plaintiffs agree that they "shall not pursue the Action" against the Settling Defendants.

This Court entered a Consent Order on February 19, 2013 extending all Defendants' time to answer or move to dismiss Plaintiffs' Consolidated Complaint until March 8, 2013. To ensure clarity, Plaintiffs wish to inform the Court that, because Plaintiffs are not pursuing the litigation against the Settling Defendants and because the parties agree that the time for the settling Defendants to respond to the Consolidated Complaint and to all further proceedings is stayed pending preliminary and final approval of the settlement agreements, no response is expected to the Consolidated Complaint from the Settling Defendants. Thank you very much for your consideration.

Respectfully,

/s/Bruce D. Greenberg
Bruce D. Greenberg

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cc: All counsel via ECF